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DISTRICT OF UTAH

BY: \_\_\_\_\_  
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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JUSTIN CHRISTOPHER,

Defendant.

INDICTMENT

VIOLATIONS:

Count 1: 18 U.S.C. § 1956(h)  
(Conspiracy to Launder Money)

Count 2: 18 U.S.C. §§ 1956(a)(1)(B)(i) &  
2 (Money Laundering and Aiding and  
Abetting)

Case: 2:14-cr-00601  
Assigned To : Benson, Dee  
Assign. Date : 12/3/2014  
Description: USA v.

The Grand Jury Charges:

COUNT I

18 U.S.C. § 1956(h)  
(Conspiracy to Launder Money)

Beginning on a date unknown and continuing up to and including November 3,  
2014, in the Central Division of the District of Utah, and elsewhere

JUSTIN CHRISTOPHER,

defendant herein, did knowingly and intentionally combine, conspire, and agree with  
others known and unknown to the grand jury to commit offenses against the United  
States, those are, to wit: to knowingly conduct and attempt to conduct financial

transactions affecting interstate commerce, which transactions involved the proceeds of specified unlawful activity, that is, distribution of marijuana in violation of 21 U.S.C. § 841(a)(1) and conspiracy to distribute marijuana in violation of 21 U.S.C. § 846, while knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, specifically, the purchase of a 2005 yellow Lamborghini Gallardo VIN ZHWGU11S25LA01949 and Lamborghini Speed Line Wheels and any tires attached, on April 28, 2014, using proceeds of narcotics trafficking, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); all in violation of Title 18, United States Code, Section 1956(h).

**COUNT II**

18 U.S.C. §§ 1956(a)(1)(B)(i) & 2  
(Money Laundering and Aiding and Abetting)

On or about April 21, 2014 through April 28, 2014, within the Central Division of the

District of Utah and elsewhere,

JUSTIN CHRISTOPHER,

defendant herein, did knowingly conduct, and aided and abetted, counseled, commanded, induced and procured, the following financial transactions affecting interstate commerce which involved the proceeds of a specified unlawful activity, knowing that the transactions were designed in whole or in part to conceal and disguise the nature,

location, source, ownership, and control of the proceeds of said unlawful activity and knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, with the below listed transactions constituting Count 2 of the Indictment:

- On or about April 21, 2014, CHRISTOPHER made a cash deposit of \$46,500 into a J.P. Morgan Chase Account controlled by JC Custom Jewelry, and wired \$46,500 to Empire Exotic Motors in Garland, Texas on that same day.
- On April 28, 2014, that same account received \$43,500 in a wire funds transfer back from Empire Exotic Motors with a notation stating "Gallard refund." CHRISTOPHER then obtained a \$45,000 cashier's check from this account payable to "Ararat Auto" and used that cashier's check to pay in part for a 2005 yellow Lamborghini Gallardo VIN ZHWGU11S25LA01949 and Lamborghini Speed Line Wheels and any tires attached;

all in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) & 2.

#### **NOTICE OF INTENT TO SEEK FORFEITURE**

As a result of committing the offenses identified in this complaint, defendant JUSTIN CHRISTOPHER, shall forfeit to the United States, pursuant to 18 U.S.C. § 982, all property, real or personal involved in such offenses, or any property traceable to such property, including, but not limited to the following:

- a. 2005 yellow Lamborghini Gallardo VIN ZHWGU11S25LA01949, and
- b. Lamborghini Speed Line Wheels and any tires attached;

**Substitute Assets:** If any of the above described forfeitable property, as a result of any act or omission of the defendant,

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred, sold to, or deposited with a third person;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

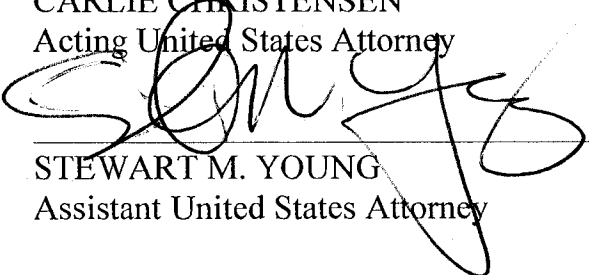
then it is the intent of the United States, pursuant to 18 U.S.C. § 982(b) and 21 U.S.C. § 853(p) to seek forfeiture of any other property of defendant up to the value of the above forfeitable property.

A TRUE BILL:

/s/

FOREPERSON OF GRAND JURY

CARLIE CHRISTENSEN  
Acting United States Attorney

  
STEWART M. YOUNG  
Assistant United States Attorney